

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

STEPHEN McCOLLOM, *et al.*,
Plaintiffs,

v.

BRAD LIVINGSTON, *et al.*,
Defendants.

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CIVIL ACTION NO. 3:12-CV-02037

**DEFENDANT UNIVERSITY OF TEXAS MEDICAL BRANCH'S
OPPOSED MOTION TO QUASH**

Comes now defendant, the University of Texas Medical Branch, by and through its attorney, the Attorney General for the State of Texas, and files this Motion to Quash. Defendant shows the following:

1. Before this court is Plaintiffs' Motion For Protective Order and To Quash Unauthorized Depositions D.E. 120;
2. Plaintiffs' Emergency Opposed Motion To Depose University of Texas Medical Branch's Expert Witness, Glenda Adams, Or To Exclude Adam's Expert testimony D.E. 123;
3. Defendant UTMB's Response To Plaintiff's Motion To Quash and Motion To Compel D.E. 127;
4. And this Defendant's Motion To Quash.

On Friday, February 14, plaintiffs noticed the deposition of Dr. Adams. See attached Exhibit A. The notice sets the location of the deposition in Dallas. However, the witness resides and works in Conroe, Texas. Plaintiffs' attorneys live in Austin, and all of defendants' attorneys live in Austin. If the court grants Plaintiffs' Emergency Motion To Depose Dr. Adams, and

particularly since this would be Dr. Adams second deposition, defendant requests that the deposition take place at her office at 200 River Point, Suite 200, Conroe, Texas 77304.

WHEREFORE PREMISES CONSIDERED, Defendant prays that Dr. Glenda Adams be deposed, if at all, in her offices in Conroe, Texas.

Respectfully submitted,

GREG ABBOTT
Attorney General of Texas

DANIEL T. HODGE
First Assistant Attorney General

DAVID C. MATTAX
Deputy Attorney General for Defense Litigation

KAREN D. MATLOCK
Assistant Attorney General
Chief, Law Enforcement Defense Division

/s/KIM COOGAN
KIM COOGAN
Assistant Attorney General
State Bar No. 00783867

Law Enforcement Defense Division
P. O. Box 12548, Capitol Station
Austin, Texas 78711
(512) 463-2080/Fax (512) 495-9139

**ATTORNEYS FOR DEFENDANT
UNIVERSITY OF TEXAS MEDICAL BRANCH**

NOTICE OF ELECTRONIC FILING

I, KIM COOGAN, Assistant Attorney General of Texas, do hereby certify that I have electronically submitted for filing, a true and correct copy of **Defendant University Of Texas Medical Branch's Opposed Motion To Quash**, in accordance with the Electronic Case Files system of the USDC – Northern District of Texas, on this the 14th day of February, 2014.

/s/ KIM COOGAN
KIM COOGAN
Assistant Attorney General

CERTIFICATE OF SERVICE

I, KIM COOGAN, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing **Defendant University Of Texas Medical Branch's Opposed Motion To Quash**, has been served by placing the same in the United States Postal Service, postage prepaid, on this the 14th day of February, 2014, addressed to:

Jeff Edwards
The Edwards Law Firm
1101 E. 11th Street
Austin, Texas 78702

Brian McGiverin
Texas Civil Rights Project
1405 Montopolis Drive
Austin, Texas 78741

Bruce R. Garcia
Office of the Attorney General
P. O. Box 12548, Capitol Station
Austin, Texas 78711

Demetri Anastasiadis
Office of the Attorney General
P. O. Box 12548, Capitol Station
Austin, Texas 78711

/s/KIM COOGAN
KIM COOGAN
Assistant Attorney General